

REMARKS

Claims 1-33 are currently pending in the application. Claims 1, 11, 20, and 33 have been amended. Applicant respectfully submits that no new matter has been added. Applicant respectfully requests reconsideration of the application in view of the foregoing amendments and the following remarks.

Claims 1-23 and 25-33 stand rejected under 35 U.S.C. § 102(b) as being anticipated by “Measuring and Visualizing Information Transfer in Networked Collaboration” by Rainer Puittinen and Ari-Pekka Hameri (“Puittinen”).

Independent claim 1 is directed to a method for determining interdependencies between project team members working on a development project. Applicant respectfully submits that Puittinen fails to teach or suggest at least one of the distinguishing features of independent claim 1, namely, receiving data indicative of a temporal relationship between a first and a second project team member resulting from modification of at least one artifact of a development project and forming at least one metric representative of an interdependency relationship between the first and second project team members. In addition, Puittinen fails to disclose a temporal relationship between the first and second project team members that is used to quantify an interdependency relationship and that quantified interdependency relationship indicates a level of work that the first and second project team members are performing on the at least one artifact of the development project.

Puittinen relates to a set of metrics that enable visualization of a performance of an organization through its electronic communication and behavior. The metrics are adapted to help in visualizing the performance of an organization through its electronic communication and behavior. A model relies on document usage as a source of raw data to visualize a true communication network of the organization. A software application using this approach is also disclosed.

In contrast to claim 1, Puittinen discloses an information exchange model based on an assumption that documents are the primary sources of information and document usage is a metric for information exchange. *See* Puittinen, page 86, para 4. Puittinen fails to disclose a metric representative of an interdependency relationship between a first and a second project team members as claimed. Furthermore, Puittinen teaches a data storage medium where information is temporarily stored on its way from a producer to a consumer. According to Puittinen, the information corresponds to a document. *See* Puittinen, page 87, para 2 and page

87, para 10. However, the information as disclosed in Puittinen does not correspond to a metric representative of an interdependency relationship.

In addition, Puittinen teaches a tool adapted to allow a single engineer to check whether intended people are reading his documents, allowing him to devise an understanding of his vital role in a large-scale effort. The tools enable all parties to check configuration related information and allows collaborations to take place at all levels. *See* Puittinen, page 95, para 4. Puittinen discloses an information sharing tool but fails to disclose a temporal relationship between a first and a second project team member resulting from modification of at least one artifact of a development project wherein the temporal relationship is used to quantify the interdependency relationship and wherein the quantified interdependency relationship indicates a level of work that the first and second project team members are performing on the at least one artifact of the development project. Applicant respectfully submits that amended claim 1 distinguishes over Puittinen and is in condition for allowance. Withdrawal of the rejection of amended claim 1 as anticipated by Puittinen is respectfully requested.

Dependent claims 2-10 depend from and further restrict independent claim 1 in a patentable sense. Applicant respectfully submits that, for at least the reasons set forth above with respect to the rejection of independent claim 1, dependent claims 2-10 distinguish over Puittinen and are in condition for allowance. Withdrawal of the rejection of dependent claims 2-10 is respectfully requested.

Independent claim 11 relates to a system for determining interdependency relationships between at least two project team members working on a development project. Applicant respectfully submits that Puittinen fails to teach or suggest at least one of the distinguishing features of independent claim 11, namely, a data collector component associated with the development project operable to collect data indicative of a temporal relationship between first and second project team members resulting from modification of the at least one object and a statistics analyzer component for statistically analyzing the collected data indicative of the temporal relationship to form at least one metric representative of an interdependency relationship. In addition, Puittinen fails to disclose that the temporal relationship between the first and second project team members is used to quantify the interdependency relationship and the quantified interdependency relationship indicates a level of work that the first and second project team members are performing on the at least one artifact of the development project.

In contrast to claim 11, Puittinen discloses an information exchange model based on an assumption that documents are the primary sources of information and document usage is a metric for information exchange. *See* Puittinen, page 86, para 4. Puittinen fails to disclose a metric representative of an interdependency relationship between a first and a second project team member as claimed. Furthermore, Puittinen teaches a data storage medium where information is temporarily stored on its way from a producer to a consumer. The information according to Puittinen corresponds to a document. *See* Puittinen, page 87, para 2 and page 87, para 10. However, the information as disclosed in Puittinen does not correspond to at least one metric representative of the interdependency relationship as claimed.

In addition, Puittinen teaches a tool adapted to allow a single engineer to check whether intended people are reading his documents, allowing him to devise an understanding of his vital role in a large-scale effort. The tools enable all parties to check configuration related information and allows collaborations to take place at all levels. *See* Puittinen, page 95, para 4. Puittinen discloses an information sharing tool but fails to disclose a temporal relationship between a first and a second project team member resulting from modification of at least one object wherein the temporal relationship is used to quantify the interdependency relationship and the quantified interdependency relationship indicates a level of work that the first and second project team members are performing on the at least one object. Applicant respectfully submits that amended claim 11 distinguishes over Puittinen and is in condition for allowance. Withdrawal of the rejection of amended claim 11 as anticipated by Puittinen is respectfully requested.

Dependent claims 12-19 depend from and further restrict independent claim 11 in a patentable sense. Applicant respectfully submits that, for at least the reasons set forth above with respect to the rejection of independent claim 11, dependent claims 12-19 distinguish over Puittinen and are in condition for allowance. Withdrawal of the rejection of dependent claims 12-19 is respectfully requested.

Independent claim 20 relates to a method for analyzing an interdependency relationship between a first and a second person working on at least one artifact. Applicant respectfully submits that Puittinen fails to teach or suggest at least one of the distinguishing features of independent claim 20, namely, performing a statistical analysis based on identified modifications to at least one artifact by first and second persons, the statistical analysis generating at least one metric indicative of an interdependency relationship between the first and

second persons. In addition, Puittinen fails to disclose formulating, via a temporal relationship between the first and second person, a quantified interdependency relationship and wherein the quantified interdependency relationship indicates a level of work that the first and second person is performing on the at least one artifact.

In contrast to claim 20, Puittinen discloses an information exchange model based on an assumption that documents are the primary sources of information and document usage is a metric for information exchange. *See* Puittinen, page 86, para 4. Puittinen fails to disclose a metric representative of an interdependency relationship between the first and second persons. Furthermore, Puittinen teaches a data storage medium where information is temporarily stored on its way from a producer to a consumer. The information according to Puittinen corresponds to a document. *See* Puittinen, page 87, para 2 and page 87, para 10. However, the information as disclosed in Puittinen does not correspond to a metric representative of the interdependency relationship.

In addition, Puittinen teaches a tool adapted to allow a single engineer to check whether intended people are reading his documents, allowing him to devise an understanding of his vital role in a large-scale effort. The tools enable all parties to check configuration related information and allow collaborations to take place at all levels. *See* Puittinen, page 95, para 4. Puittinen discloses an information sharing tool but fails to disclose formulating, via a temporal relationship between the first and second person, a quantified interdependency relationship wherein the quantified interdependency relationship indicates a level of work that the first and second person is performing on the at least one artifact. Applicant respectfully submits that amended claim 20 distinguishes over Puittinen and is in condition for allowance. Withdrawal of the rejection of amended claim 20 as anticipated by Puittinen is respectfully requested.

Dependent claims 21-23 and 25-32 depend from and further restrict independent claim 11 in a patentable sense. Applicant respectfully submits that, for at least the reasons set forth above with respect to the rejection of independent claim 20, dependent claims 21-23 and 25-32 distinguish over Puittinen and are in condition for allowance. Withdrawal of the rejection of dependent claims 21-23 and 25-32 is respectfully requested.

Independent claim 33 relates to a computer-readable medium. Applicant respectfully submits that Puittinen fails to teach or suggest at least one of the distinguishing features of independent claim 33, namely, software configured to cause a processor to receive data indicative of a temporal relationship between a first and a second project team member resulting

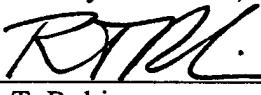
from modification of at least one artifact of a development project. In addition, Puittinen fails to disclose that the temporal relationship between the first and second project team members is used to quantify the interdependency relationship and the quantified interdependency relationship indicates a level of work that the first and second project team members are performing on the at least one artifact of the development project. Additionally, Applicant submits that claim 33 patentably distinguishes over Puittinen for similar reasons to those discussed above with respect to independent claims 1, 11, and 20. Withdrawal of the rejection of amended claim 33 as anticipated by Puittinen is respectfully requested.

Claim 24 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Puittinen in view of official notice. Dependent claim 24 depends from and further restricts independent claim 20 in a patentable sense. Applicant respectfully submits that, for similar reasons to those set forth above with respect to the rejection of independent claim 20, dependent claim 24 distinguishes over Puittinen and official notice and is in condition for allowance. Withdrawal of the rejection of dependent claim 24 is respectfully requested.

In view of the above amendment, Applicant believes the pending application is in condition for allowance.

Dated: May 3, 2006

Respectfully submitted,

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